

BOBBY JINDAL
Governor

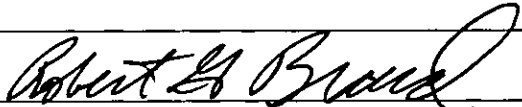
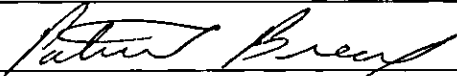


HAROLD LEGGETT, PH.D.
Secretary

Louisiana Department of Environmental Quality
Baton Rouge Regional Office

Used Oil Inspection Report

Inspection Date:	12/6/2007	Incident No.:	N/A		
AI No.:	47316	Alt. ID/Permit No:	LAD092096106		
Company Name:	Hydro Carbon Recovery Services Inc./ former Siemens Water technologies Corporation				
Physical Location:	14890 Intracoastal Drive				
	New Orleans	LA	Parish:	Orleans	
	(City)	(State)			
Mailing Address:	Same above			70129	
	(Address)	(City)	(State)	(Zip)	
Facility Representative/Title:	Tom Fancett, Operations Manager				
Facility Representative Telephone No.:	800-523-9071; 504-254-2982; cell 504-382-0084				
LDEQ Lead Inspector:	Robert G. Braud				
Other Inspectors:	None				

Report By:		5/14/2008
	Robert G. Braud, Environmental Scientist 3	(Date)
Reviewed By:		6-16-08
	Pat Breau, Environmental Scientist Supervisor	(Date)

AI No:	47316	AI Name	Hydro Carbon Recovery Services, Inc.
Alt. ID No:	LAD092096106	Date of Inspection	12/6/2007

INTRODUCTION/HISTORY:

On December 6, 2007, I conducted a Resource Conservation and Recovery Act (RCRA) Full Compliance Evaluation (FCE) for "Used Oil" at Hydro Carbon Recovery Services Inc.(HCRSI), former Siemens Water Technologies Corporation located at 14890 Intracoastal Drive, New Orleans, Orleans Parish, Louisiana. Tom Fancett, Branch Manager for HCRSI assisted in the inspection. Mr. Suresh K. Sharma, MS, PG, Technical Director with MS Environmental Consultants assisted with the RCRA Compliance Inspection Report.

The last FCE, performed on March 29, 2007, resulted in an area of concern. It was noted at the time of the facility tour that the facility had already replaced a foundation and Water Tank 110 within the containment area, but in doing so removed approximately 35 feet of their containment wall. On April 21, 2005, LDEQ Inspector observed that the facility had temporarily filled the void in containment with soil and covered it with a pvc liner. The facility corrected the area of concern by completing the secondary containment wall.

On October 2, 2006, the facility submitted an addendum to the Department, 1701-Certification of Merger notifying the merger of U.S. Filter Recovery Services (Mid Atlantic) Inc. into its immediate parent company, Siemens Water Technologies, Corporation (SWTC) dated August 31, 2006. Since this inspection, effective October 1, 2007, Siemens Water Technologies Corp. is separating the assets of the aforementioned facilities into the legal entity Hydrocarbon Recovery Services, Inc. At the present time the new permitted facility is HCRSI.

FACILITY DESCRIPTION:

HCRSI operates a used oil collection and processing facility, which picks up used oil from used oil generators. The types of facilities which send their oil to the facility for processing include: automobile repair shops, oil changing facilities, and industries performing vehicle maintenance. The facility has a Waste Acceptance and Analysis Plan that is followed. The process is described below:

Field Pre-Acceptance

Drivers are trained to recognize odd, different or unusual used oil generation sources and processes from those that are considered normal and recurring. All material is examined using a halogen detection meter prior to acceptance. Prior to acceptance of any new, different, or unusual waste, or if the detection meter indicates a true or false positive, field personnel will take a representative sample using acceptable protocol. If unacceptable, the customer will be advised of alternative methods of disposal.

Facility Pre-Acceptance

When a tanker of used oil arrives at the terminal, a multi-layered representative sample is obtained and taken to the lab before unloading. Once on site, used oil characterization, which includes ignitability, pH (of primarily water), and total halogens (by using EPA Method 9070 and ASTM D-808) both in house and offsite, will be performed.

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In-house testing is done using a Rosemont/Dohrmann DX-2000 gas chromatograph analyzer for halogen quantification. If the halides are over 1,000 mg/L, the customer supplying the load will be contacted and given the option of having the load returned, or having it sent to a hazardous waste treatment or disposal facility. The analysis plan describes the steps taken if ignitibility, corrosibility or reactivity characteristics are exceeded.

On Specification Used Oil Testing

Used oil coming into the facility is loaded in either tanks T-1, T-2, T-3, T-4 (known as treater vessels). The facility uses elevated temperatures and de-emulsifiers, to encourage phase separation, whereby water falls to the tank's bottom, an inter-phase layer (rag layer) forms in the tanks mid-section and oil floats to the top. Oil above the inter-phase layer is transferred to one of seven used oil storage tanks. The used oil inside these tanks is tested for used oil on-specification levels and once verified, the on-specification used oil is sent to either Tank 840-A or 840 B for storage. Prior to shipment off-site, the on-specification used oil is transferred to tanks T-13, T-14, and T-15 from Tank 840 A or B, and shipped off-site to fuel burners. HCRSI ships approximately 20% of its finished product to asphalt companies and 80% to other marketers such as Enjet of Houston, Stone Oil Co., and Coastal Fuels.

The transfer of oil and water from tank to tank is recorded using mass balance records. Product streams or used oil accumulations found to be characteristically off-specification, i.e. flash point, corrosibility, etc., are blended back to on-specification status before being transferred to on-specification tanks. Off-specification used oil accumulations with halogen levels over 1000 mg/L but less than 4,000 mg/L are transported via rail car to HCRSI of Florida (ALA 065680614) as refinery feed stock. The inter-phase layer, resulting from the used oil treatment process is also sent to Florida to be burned for energy recovery.

Water from the treatment process is placed in Tank 110 then routed to the wastewater treatment process. Water from the oil/water separator and from the sludge stabilization area is also routed to the wastewater treatment unit. The entire facility is designed such that rainwater and wash down areas drain to the sump and oil/water separator located at the northeast corner of the facility. The facility has two NPDES outfalls, Outfall 001 drains from the containment areas of the large tanks and Outfall 002 drains from the parking lot. Pre-treated water is discharged into the New Orleans City sewer line from tanks T-5, T-6, and T-9.

HCRSI also accepts anti-freeze, water contaminated with fuels, non-hazardous sump materials and oil filters. These materials are either processed on site or shipped to Florida for processing.

RECORDS REVIEW:

Used oil is tracked by a manifest developed by HCRSI, which meets regulatory requirements. The manifests are tracked on a computer database by last pickup date. The database contains customer information such as facility name, address, contact person, and other historical data such as volume, material type, and past pick up dates relating to the customer.

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Hard copies of the manifest were also available for review. No deficiencies were noted. The latest Hazardous Waste Notification form, dated November 1, 2007, was examined. HCRSI has notified as a used oil Transporter & Transfer Facility, Processor, Marketer, and a Conditionally Exempt Small Quantity Generator as a non-acute hazardous waste and classified as a Large Quantity Handler of Universal Waste-antifreeze

The Waste Acceptance and Analysis Plan was reviewed and found to contain all of the required information and sampling frequencies.

The Contingency/Spill Response and Spill Prevention, Control, and Countermeasures (SPCC) Plan were reviewed. The latest update from ENSR Corporation of the SPCC was completed on February 22, 2007. No deficiencies were noted.

Analysis of on-specification used oil was reviewed and no deficiencies were noted. On-specification used oil is analyzed for halogen content, flash point, metals, and Polychlorinate Biphenyls (PCBs) by an outside laboratory on a monthly basis.

FACILITY INSPECTION:

The inspection included an evaluation of the used oil storage tanks, laboratory, processing, used oil filter storage, and truck washing areas. Mr. Tom Fancett, Branch Manager of HCRSI represented the facility and assisted me in the inspection.

Tanks 840 A & B, which contain on-specification used oil, are composed of metal equipped with leak detection sensors, are located inside a 5- foot cinder block containment system with a concrete floor. The tanks are labeled "Used Oil" and appeared to be in good condition. The facility initially lacked water pressure after Hurricane Katrina from the city utility to keep the inside of their containment as clean as they see fit. At present the water pressure has been restored and all rain waters are contained inside containment and treated at the oil water separators.

The solid material collection area, which is used to accumulate used oil filters and other used oil-contaminated media, was not operational at the time of the inspection because of Hurricane Katrina damages to the facility. The solid material collection area is located inside a covered concrete containment system. The area also contains a sump where liquids are allowed to accumulate before being pumped to the oil/water separator. The sump area appeared to be in good condition. At the present time, the used oil filters are processed at the Opelousas facility.

The truck washing area is located adjacent to the solid material collection area. The truck washing area was not in operation at the time of the inspection because of hurricane damages. The area contains a sump that is used to collect truck wash waters and the area has a cover. The sump is connected to the facility's oil/water separator.

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Once the wash water enters the oil/water separator, the oil is skimmed from the top and transferred to one of the used oil storage tanks for processing. The water from the separator is sent to the wastewater treatment facility. At the present time this operation is only operating at 10 % capacity, because of electrical outages from Entergy. The area was clean at the time of the inspection. The latest inspection conducted by New Orleans Sewerage and Water Board at the wastewater treatment unit was done on December 21, 2006 with no areas of concern. The four used oil treatment tanks labeled "Used Oil" are located inside a 12-inch bermed area with a concrete floor. The tanks appeared to be in good condition with no noticeable cracks or gaps.

The laboratory building where the used oil analyses were determined was demolished due to damages from Hurricane Katrina. Mr. Fancett mentioned that HCRSI was waiting for building permits from the city to rebuild. Once a month, analysis documentation is kept on-site for review and previous month records are kept at HCRSI's Baton Rouge Facility in Port Allen. The Chlor-D-Tests are conducted on site. All records from before the hurricane were destroyed. The available records reviewed at the time of the inspection appeared to be complete.

The facility appears to be recovering from hurricane damages and hopes, as Mr. Fancett mentioned, to be in full operation soon. The facility is operating at about 100% capacity. No areas of concern were observed at the time of this inspection.

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LIST OF ATTACHMENTS

- | | |
|---------------------|--|
| ATTACHMENT 1 | Field Interview Form |
| ATTACHMENT 2 | Notification of Hazardous Waste Activity (HW-1) |
| ATTACHMENT 3 | RCRA Compliance Inspection Report for Used Oil |

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ATTACHMENT 1

Field Interview Form (2 Pages)

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**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 43316 INSPECTION DATE: 12/6/07 TIME OF ARRIVAL: 1:15pm
ALTERNATE ID#: LA0092096106 DEPARTURE DATE: 12/6/07 TIME OF DEPARTURE: 3:00pm
(ID Type/Number) (City) (State) (ZIP)
FACILITY NAME: Hydrocarbon Recovery Services, Inc. former Siemens Water Technologies PH #: 504-254-2982
LOCATION: 14890 Intra-Coastal Drive, New Orleans, LA 70129

RECEIVING STREAM (BASIN/SUBSEGMENT): _____ PARISH NAME: Orleans

MAILING ADDRESS: Same as above
(Street/P.O. Box)
FACILITY REPRESENTATIVE: Tom Farnett (City) (State) (ZIP)
FACILITY REPRESENTATIVE PHONE NUMBER: _____ TITLE: Branch Manager
NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above):
John Boswell / Transportation Manager

INSPECTION TYPE: FCE PROGRAM INVOLVED: AIR ☒ WASTE ☒ WATER ☐ OTHER Used Oil
INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

This inspection was conducted to verify compliance with the used oil regulations. Record review: Since the last inspection conducted on 3/29/07 Siemens Water Technologies had submitted a name change to Hydrocarbon Recovery Services, Inc. Also, Mr. Farnett, Branch Manager updated their Hazardous Waste Notification to the Department. On November 1, 2007 the Department posted the notification. The facility's Water Treatment Plant was last inspected on Oct 16, 2007 by the New Orleans SEW Board. Facility maintains their Branch Recovery logs of all generators with manifest, products, Quantity and test results. Service order manifest are on file.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
_____	_____	YES NO
_____	_____	YES NO
_____	_____	YES NO

PHOTOS TAKEN: ☐ YES ☒ NO SAMPLES TAKEN: ☐ YES ☒ NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: [Signature]
PRINT NAME: JOHN BOSWELL
(NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): Robert H. Bruce CROSS REFERENCE: _____
ATTACHMENTS: _____
REVIEWER: Peter Bruce

NOTE: The Information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
INSPECTOR OBSERVATIONS (cont'd)

AGENCY INTEREST#: 47316 ALTERNATE ID#: LAD 092096106 INSPECTION DATE: 12/6/07
FACILITY NAME: Hydrocarbon Recovery Services, Inc.

INSPECTOR OBSERVATIONS CONT'D:

and were available for review. Analysis test for waste acceptance are conducted at their Plant City, Florida and Kilgore, Texas labs, and these records were available for review via email documentation. All manifest were in order.

Tour of facility: Tanks are labeled, containment are in good condition. Used oil filters are contained inside of containers and are under cover. Facility has installed their new office trailers on site, but are not in service as of yet. The facility's Analytical lab has not been built as of yet. Facility appeared to be well maintained at the time of this inspection.

INITIALS OF RECEIPT

JAB

AI No:	47316	AI Name	Hydro Carbon Recovery Services, Inc.
Alt. ID No:	LAD092096106	Date of Inspection	12/6/2007


ATTACHMENT 2

NOTIFICATION OF HAZARDOUS WASTE HW-1

(3 Pages)

TSF

AI 47316

MAIL COMPLETED FORM TO: LDEQ/OES/ Environmental Assistance Division/CAS PO Box 4313 Baton Rouge, LA 70821-4313	United States Environmental Protection Agency and STATE OF LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal CHOOSE ONLY ONE REASON PER SUBMITTAL	A. Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). or <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). or <input type="checkbox"/> As a component of the Hazardous Waste Report. B. Number of Employees: Approximately 24		
2. Site EPA ID Number	EPA ID Number: LAD092096106		
3. Site Name	Legal Name: Hydrocarbon Recovery Services		
4. Site Location (Physical address, NOT PO Box or Route)	Street Address: 14890 Intracoastal Drive		
	City, Town, or Village: New Orleans	State: LA	
	County/Parish Name: Orleans	Zip Code: 70129	
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s)	A. 423930	B.	
	C.	D.	
7. Site Mailing Address	Street or P. O. Box: 14890 Intracoastal Drive		
	City, Town, or Village: New Orleans		
	State: LA		
	County/Parish Name: Orleans	Zip Code: 70129	
8. Site Contact Person	First Name: Tom	MI:	
	Last Name: Fancett	Phone Number Extension:	
9. Legal Owner and Operator of the Site (see instructions)	A. Name of Site's Legal Owner: Hydrocarbon Recovery Services		
	Date Became Owner (mm/dd/yyyy): 10/1/2007		
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Operator: Hydrocarbon Recovery Services		
	Date Became Operator (mm/dd/yyyy): 10/1/2007		
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

Regs & Certs

RECEIVED

 RCRA Info 11/5/7
 TEMPO 11/5/7

NOV 01 2007

LDEQ
OES/EAD

EPA ID No. L A D 0 9 2 0 9 6 1 0 6

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes)**A. Hazardous Waste Activities****1. Generator of Hazardous Waste**

(Select one of the following categories)

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs.)
Non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.)
Non-acute hazardous waste; or☒ c. CESQG: Less than 100 kg/mo
Non-acute hazardous waste☐ d. NON-GENERATOR

In addition, indicate other generator activities (check all that apply)

☐ e. United States Importer of Hazardous Waste☐ f. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

☐ **2. Transporter of Hazardous Waste**☐ Transfer Facility Status
(Transporter status must be indicated above)☐ **3. Treater, Storer, or Disposer of HW (at your site)**
Note: A hazardous waste permit is required for this activity.☐ Permitted ☐ Interim Status ☐ Proposed☐ **4. Recycler of Hazardous Waste (at your site)**
Note: A hazardous waste permit may be required for this activity.☐ **5. Exempt Boiler and/or Industrial Furnace**☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, Refining Furnace Exemption☐ **6. Underground Injection Control****B. Universal Waste Activities (Indicate Activity Type)**☒ **1. Large Quantity Handler of Universal Waste** [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
d. Antifreeze	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Mercury-containing equipment	<input type="checkbox"/>	<input type="checkbox"/>
f. Electronics	<input type="checkbox"/>	<input type="checkbox"/>

☐ **2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Indicate Activity Type)☒ **1. Used Oil Transporter**☒ a. Transporter
☒ b. Transfer Facility☒ **2. Used Oil Processor and/or Re-refiner**☒ a. Processor
☐ b. Re-refiner☐ **3. Off-Specification Used Oil Burner**☒ **4. Used Oil Fuel Marketer**☒ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☒ b. Marketer Who First Claims the Used Oil Meets the Specifications☐ **5. Used Oil Fuel Burner**
(Indicate Combustion Device(s))☐ Utility Boiler ☐ Industrial Boiler ☐ Industrial Furnace**11. Description of Hazardous Wastes****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.


D007	D008	D028	F002			

RECEIVED

NOV 01 2007

LDEQ
OES/EAD

[illegible][illegible]

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	Tom Fancett, Branch Manager	10/23/2007

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AI No:	47316	AI Name	Hydro Carbon Recovery Services, Inc.
Alt. ID No:	LAD092096106	Date of Inspection	12/6/2007

ATTACHMENT 3

RCRA Compliance Inspection Report for Used Oil

(15 Pages)

Date of Inspection	12/6/2007	EPA ID	LAD09096106			
<p align="center"><u>RCRA COMPLIANCE INSPECTION REPORT</u> <u>"USED OIL CHECKLIST"</u></p>						
FACILITY	Hydro Carbon Recovery Services, Inc.	PHONE	504-254-2982			
LOCATION	14890 Intracoastal Drive, New Orleans, LA					
MAILING ADDRESS	14890 Intracoastal Drive, New Orleans, LA 70129	PARISH	Orleans			
<p align="center"><u>PART 1</u> <u>GENERATOR STANDARDS FOR USED OIL STORAGE/USED OIL AGGREGATION PTS.</u></p>						
1.	Is there a properly prepared copy of a Spill Prevention and Countermeasure (SPCC) Plan as required by 40 CFR part 112? (4013)	X	Yes		No	NA
<p>*Note: Applies to underground tank systems of more than 42,000 gallons, and above ground systems of more than 1320 gallons or storage in containers exceeding 660 gallons.</p>						
2.	Do underground storage tanks meet the requirements of LAC 33:XI? (4013)		Yes		No	X NA
<p>*Note: Applies to underground tank systems with 10% or more of the system volume below the ground.</p>						
3.	Are containers and aboveground tanks used to store used oil in good condition? (no severe rusting, apparent structural defects or deterioration) (4013)	X	Yes		No	NA
	Leaking		Yes	X	No	NA
	Clearly marked or labeled "Used Oil"?	X	Yes		No	NA
	Are fill pipes used to transfer used oil into under-ground storage tanks clearly marked "Used Oil"?		Yes		No	X NA
4.	Is there any evidence of a release of used oil to the environment? (4013.D)		Yes	X	No	NA
5.	<p align="center"><u>TRANSPORTERS:</u></p>					
	Facility Name: Siemens Water Technologies Corp. (SWTC)	EPA Id: LAD092096106				
	Facility Name:	EPA Id				
	or do they:					
	Use self-transportation of small amounts to approved collection center (4017.A)					
	Use self-transportation of small amounts to aggregation point owned by generator (4017.B)					
X	Transported under a contractual agreement as per (4017.C)					
6.	Has used oil been shown not to exceed any specifications listed in Table 1?	X	Yes		No	NA
<p align="center">IF NO: (CHECK THOSE THAT HAVE NOT BEEN DETERMINED)</p>						
	Arsenic less than 5 ppm					

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

	Cadmium less than 2 ppm					
	Chromium less than 10 ppm					
	Lead less than 100 ppm					
	Flash point 100°F minimum					
	Total halogens less than 1,000 ppm maximum					
	or if the rebuttable presumption can be applied by the generator (LAC 4003.B.1)					
	Total halogens less than 4,000 ppm maximum					
<u>If YES: The Facility is a Used Oil Fuel Marketer.</u>						
7.	Has the facility notified as a used Oil Fuel Marketer?	X	Yes		No	NA
8.	Do they directly ship to a used oil burner?	X	Yes		No	NA
<u>If YES: The Facility is a Used Oil Fuel Marketer.</u>						
9.	Has the facility notified as a used oil fuel marketer?	X	Yes		No	NA
<u>Complete PART VII On-specification Used Oil Fuel</u>						
<u>PART VII</u>						
<u>ON-SPECIFICATION USED OIL FUEL</u>						
A generator, transporter, processor/re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of LAC 33:V.4005 by performing analyses or obtaining copies of analyses documenting that the used oil fuel meets the specifications.						
1.	Are copies of analyses of the used oil maintained on-site? LAC 33:V.4081.B	X	Yes		No	NA
2.	Are they retained for a period of three years? LAC 33:V.4081.B	X	Yes		No	NA
3.	Has the facility notified as a used oil fuel marketer? LAC 33:V.4083	X	Yes		No	NA
4.	Does the facility keep a record of each shipment of used oil to an on-specification used oil burner?	X	Yes		No	NA
<u>Does the following appear on the manifest?</u> (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) LAC 33:V.4085.B						
The name and address of the receiving facility						
The quantity of used oil fuel delivered						
The date of shipment or delivery						
Cross-reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under LAC 33:V.4081.A						
	Are all shipments of used oil accompanied by a manifest? LAC 33:V.4053?	X	Yes		No	NA
How many manifests were inspected? About ten						

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

**Does the following information appear on the manifests?
(CHECK ANY NOT APPEARING ON THE MANIFEST) LAC 33:V.4053.B**

	Name and address of the generator, transporter, or processor/ re-refiner who provided used oil.
	Name and address of the burner, processor/re-refiner, or disposal facility who received the used oil.
	The EPA Id number of the transporter who delivers the used oil to the burner, processor/re-refiner, or disposal facility
	The EPA Id number of the burner, processor/re-refiner, or disposal facility who will receive the used oil
	The quantity of used oil shipped
	Date of shipment

**PART II
USED OIL TRANSPORTERS AND TRANSFER FACILITIES**

1.	Does the facility transport used oil?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
	List some of the primary generating facilities. Dealers, Carwashes, Retail oil change facilities.						
2.	Does the transporter determine whether the total halogen content of the collected used oil is below 1,000 ppm?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
3.	If testing demonstrates that the total halogen content of the used oil is above 1,000 ppm, does the transporter obtain analysis and/or information to rebut the presumption that it is hazardous waste (4033.C)	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
4.	Are analyses or information used to comply with LAC 33:V.4033.A-C retained for three years?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
5.	Does the facility mix any other waste streams with the used oil? (4003)	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	NA

IF YES: SEE USED OIL PROCESSOR

	If yes, has a determination been made on the wastestream being mixed with the used oil?			Yes		No	X	NA
	How?	Knowledge of process?		Yes		No	X	NA
	Testing?			Yes		No	X	NA
	Frequency of Testing?							
6.	Has the used oil been determined by the generator to be on-spec?		X	Yes		No		NA

IF YES: COMPLETE PART VII ON-SPECIFICATION USED OIL FUEL

	If NO: Has the facility notified as a used oil transporter? (4029)	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	NA
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RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

7.	Upon delivery to a receiving facility, has the used oil been shown not to exceed any specifications listed in Table 1? (4005)	X	Yes		No		NA
<p align="center">If NO: (CHECK THOSE THAT HAVE <u>NOT</u> BEEN DETERMINED)</p>							
	Arsenic less than 5 ppm						
	Cadmium less than 2 pp						
	Chromium less than 10 ppm						
	Lead less than 100 ppm						
	Flash point 100°F minimum						
	Total halogens less than 1,000 ppm maximum						
	or if the rebuttable presumption can be applied by the generator (LAC 4003.B.1)						
	Total halogens less than 4,000 ppm maximum						
<p align="center"><u>If YES: The Facility is a Used Oil Fuel Marketer</u></p>							
<p align="center"><u>COMPLETE PART VII ON-SPECIFICATION USED OIL FUEL</u></p>							
8.	Are trucks previously used to transport Hazardous Waste emptied as described in LAC 33:V.109 prior to transporting used oil?		Yes		No	X	NA
	If NO, has the used oil been transported as a hazardous waste or managed under the provisions of LAC 33:V.4003.B?					X	
9.	<u>Does the transporter deliver to</u>						
A	Another transporter with EPA #		Yes		No	X	NA
b	Used oil processor/re-refiner with EPA #		Yes		No	X	NA
C	Off specification used oil burner with EPA #		Yes		No	X	NA
D	On specification used oil burner		Yes		No	X	NA
10.	Does the transporter comply with all applicable requirements under the US DOT regulations?	X	Yes		No		NA
11.	Is there any evidence of a release of used oil to the environment? (4031)		Yes	X	No		NA
12.	Are all shipments of used oil accompanied by a manifest? (4037)	X	Yes		No		NA
	How many manifests were inspected? Ten						
	Are manifests retained for three years?	X	Yes		No		NA
<p align="center"><u>Does the following information appear on the manifests?</u> (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) (LAC 4037)</p>							
<p align="center"><u>FOR ACCEPTED LOADS:</u> (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) (LAC 4037)</p>							
	Name and address of the generator, transporter, or processor/re-refiner who provided used oil						
	EPA Id number (if applicable) of the facility providing the used oil for transportation						
	The quantity of used oil accepted						
	The date of acceptance						
	Dated signature of facility providing the load						

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

**FOR DELIVERED LOAD:
(CHECK ANY NOT APPEARING ON THE MANIFEST) (LAC 4037)**

	Name and address of receiving facility					
	EPA Id number for receiving facility, when applicable or available.					
	Quantity of oil delivered					
	Date of delivery					
	Dated signature showing receipt of the used oil					
13.	Is there any evidence of a release of used oil to the environment? (4035)		Yes	X	No	NA
14.	Are residues generated from the storage or transportation process? Residues generated are recycled only.		Yes	X	No	NA
15.	Are these residues managed as required by LAC 33:V.4003.E? As tank bottom sludge.		Yes	X	No	NA

**PART III
USED OIL STORAGE AT TRANSFER STORAGE FACILITIES**

1.	Does the facility store used oil?	X	Yes		No	NA
	If yes, is it stored for less than 24 hours?		Yes	X	No	NA
	If no, has the facility notified as a transfer storage facility		Yes		No	X NA
	Has the facility been approved?		Yes		No	X NA
2.	Is there a properly prepared copy of a Spill Prevention and Countermeasure (SPCC) Plan as required by 40 CFR part 112? (4013). Updated on February 22, 2007 by ENSR Corporation.	X	Yes		No	NA

***Note: Applies to underground tank systems of more than 42,000 gallons, and above ground systems of more than 1320 gallons or storage in containers exceeding 660 gallons**

3.	Do underground storage tanks meet the requirements of LAC 33:XI? (4013)		Yes		No	X NA
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***Note: Applies to underground tank systems with 10% or more of the system volume below the ground.**

4.	Are containers or above-ground tanks used to store used oil in good condition? (no severe rusting, apparent structural defects or deterioration)	X	Yes		No	NA
	Leaking?		Yes	X	No	NA
5.	Are containers or above ground tanks	X	Yes		No	NA
A	Is the containment system : Diked, bermed, or have retaining walls (ALL)		Yes		No	NA
	Does it have a floor?	X	Yes		No	NA
	Is it impervious to prevent release of used oil to the soil, groundwater, or surface water?	X	Yes		No	NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

B	Clearly labeled "used oil"? (4035.G)	X	Yes		No		NA
	Are fill pipes used to transfer used oil into underground storage tanks clearly marked "Used Oil"?		Yes		No	X	NA
6.	Is there any evidence of a release of used oil to the environment? (4035)		Yes	X	No		NA
7.	Are residues generated from the storage or transportation process?		Yes	X	No		NA
	Are these residues managed as required by LAC 33:V.4003.E?		Yes		No	X	NA
8.	Has used oil been shown not to exceed any specifications listed in Table 1 LAC 33:V.4005?		Yes	X	No		NA

IF NO: (CHECK THOSE THAT HAVE NOT BEEN DETERMINED)

	Arsenic less than 5 ppm
	Cadmium less than 2 ppm
	Chromium less than 10 ppm
	Lead less than 100 ppm
	Flash point 100°F minimum
	Total halogens less than 1,000 ppm maximum
	or if the rebuttable presumption
	can be applied by the generator (LAC 4003.B.1)
	Total halogens less than 4,000 ppm maximum

IF YES: THE FACILITY IS A USED OIL FUEL MARKETER

PART IV
STANDARDS FOR USED OIL PROCESSORS AND RE-REFINERS

This sub-chapter applies to all facilities that perform chemical or physical operations designed to produce a used oil-derived product or to make the used oil more amenable for production of fuel oils, lubricants or other used oil-derived products. This includes blending, filtration, simple distillation and chemical or physical separation and re-refining.

****IF ALL OIL RECEIVED IS ON-SPECIFICATION**
SKIP TO PART VII ON-SPECIFICATION USED OIL FUEL

1.	Has the facility notified as a used oil <u>processor/re-refiner</u> ? This facility is a Processor only.	X	Yes		No		NA
2.	Is there evidence of fire, explosion or contamination of the environment?		Yes	X	No		NA
3.	Is the facility equipped with (4035.A.2 Required Equipment? Auto fence and cameras will be replaced because of Hurricane Katrina damages.	X	Yes		No		NA
A	Internal communications or alarm systems	X	Yes		No		NA
B	Telephone or two-way radio to call emergency response personnel. ALL	X	Yes		No		NA
C	Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment	X	Yes		No		NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

D	Water of adequate volume for hoses, sprinklers or water spray system	X	Yes		No		NA
	1. Describe source of water. New Orleans City Water source by Hydrate.						
	2. Indicate flow rate and/or pressure and storage capacity if available. Not available, but pressure has been restored to normal Mr. Fancett told me.						
	3. Are all emergency equipment tested and maintained as necessary to ensure proper operation in an emergency? Facility as a Facility Response Plan	X	Yes		No		NA
5.	Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment? (4045.A.5)	X	Yes		No		NA
6.	Has the owner/operator made arrangements with police, fire department, hospitals, and emergency response teams to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (4045.A.6)	X	Yes		No		NA
	If no, has the owner/operator attempted to make such arrangements?		Yes		No	X	NA
	If local authorities declined, has this been documented in the operating record?		Yes		No	X	NA
7.	In the case that more than one police or fire department might respond, is there a designated primary authority? The facility is the primary authority.	X	Yes		No		NA
	Indicate Primary Authority. Mr. Thomas Fancett/ Manager						
8.	Does the owner/operator have phone numbers or and agreements with State emergency response teams, emergency response contractors and equipment suppliers? Oil Mop, Gardner and USES	X	Yes		No		NA
A	Are they readily available to the emergency coordinator?	X	Yes		No		NA
9.	Does the processor/re-refiner use transporters who have an EPA Id. #? LAD09096106	X	Yes		No		NA
<u>CONTINGENCY PLAN AND EMERGENCY PROCEDURES:</u>							
1.	Does the facility have a contingency plan? (4045.B)	X	Yes		No		NA
	If yes, does it contain:	X	Yes		No		NA
A	Actions to be taken by facility personnel in response to fires, explosions or unplanned releases to the environment?	X	Yes		No		NA
B	Description of arrangements with police, fire, and hospital officials?	X	Yes		No		NA
C	List of names, addresses, phone numbers of persons qualified to act as emergency coordinator?		Yes		No		NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

D	List, including the location and physical description of all emergency equipment?	X	Yes		No		NA
E	Evacuation plan for facility personnel including signals, primary and alternate routes?	X	Yes		No		NA
2.	Is a copy of the contingency plan maintained at the facility?	X	Yes		No		NA
3.	Has a copy been supplied to the local police, fire depts., and hospitals? Available for responders.		Yes		No	X	NA
4.	Has the contingency plan been updated and amended as necessary?	X	Yes		No		NA
5.	Is the plan a revised SPCC Plan? Revised on 2/22/2007.	X	Yes		No		NA
6.	Is there an emergency coordinator on-site or within a short driving distance from the facility at all times? He lives about 30 to 45 minutes from the facility.	X	Yes		No		NA
7.	If yes, list the primary emergency coordinator: Tom Fancett						
Rebuttable Presumption for Used Oil							
To ensure that used oil managed at a processing/re-refining facility is not hazardous waste under the rebuttable presumption of LAC 33:V.4003.B.1.b, the owner or operator must determine whether the total halogen content of used oil managed at the facility is above or below 1,000 ppm.							
1.	Does the processor/re-refiner make this determination? This facility is a processor.	X	Yes		No		NA
2.	Does the processor/re-refiner make this determination based on testing or by applying knowledge of the halogen content of the used oil in light of the materials or processes used?	X	Yes		No		NA
Used Oil Management:							
1.	Does the facility's management procedures address the SPCC requirements listed in 40 CFR part 112?	X	Yes		No		NA
2.	Are containers or above-ground tanks used to store used oil in good condition? (no severe rusting, apparent structural defects or deterioration) (4049.B). Facility has above ground tanks only.	X	Yes		No		NA
	Leaking?		Yes	X	No		NA
3.	ARE CONTAINERS OR ABOVE GROUND TANKS						
A	Equipped with a secondary containment system?(4049.C,D, & E)	X	Yes		No		NA
	Is the containment system :						
	Diked, bermed, or have retaining walls? Facility has all each listed.	X	Yes		No		NA
	Does it have a floor?	X	Yes		No		NA
	Is it impervious to prevent release of used oil to the soil, groundwater, or surface water?	X	Yes		No		NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

B	Clearly labeled "used oil"? (4049.F)	X	Yes		No		NA
	Are fill pipes used to transfer used oil into underground storage tanks clearly marked "Used Oil"?		Yes		No	X	NA
4.	Is there any evidence of a release of used oil to the environment? (4049.G)		Yes	X	No		NA
5.	Does the facility have a written analysis plan describing procedures that will be used to comply with the analysis requirements of LAC 33:V.4047 and if applicable LAC 33:V.4081?	X	Yes		No		NA
<u>For used oil not determined to meet LAC 33:V.4005 Table 1 specifications</u> <u>Does the plan contain the following:(4051.A)</u>							
A	Whether knowledge or analysis is used to determine halogen content?	X	Yes		No		NA
	If sample analysis is used, is the representative sample obtained by						
1.	One of the sampling methods in LAC 33:V.4901.Appendix D	X	Yes		No		NA
2.	A method shown to be equivalent under LAC 33:V.105.H and I	X	Yes		No		NA
B	Frequency of sampling and whether it is performed on-site or off-site	X	Yes		No		NA
C	Methods used to analyze for the parameters in LAC 33:V.4047	X	Yes		No		NA
D	Type of information used to determine halogen content	X	Yes		No		NA
	For on specification used oil in LAC 33:V.4081 does the plan contain the following:						
A	Whether knowledge or analysis is used to determine halogen content?	X	Yes		No		NA
	If sample analysis is used, is the representative sample obtained by						
1.	One of the sampling methods in LAC 33:V.4901.Appendix D;	X	Yes		No		NA
2.	A method shown to be equivalent under LAC 33:V.105.H and I	X	Yes		No		NA
B	Whether used oil will be sampled and analyzed prior to or after any processing/re-refining	X	Yes		No		NA
C	Frequency of sampling and whether it is performed on-site or off-site. On site from two day tanks.	X	Yes		No		NA
D	Methods used to analyze for the parameters in LAC 33:V.4081. Are conducted by PACE Labs.	X	Yes		No		NA
E	Type of information used to make the on-specification used oil fuel determination.	X	Yes		No		NA
6.	Are all shipments of used oil accompanied by a manifest? (4037)	X	Yes		No		NA
	How many manifests were inspected? Ten						

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

	Are the Manifests retained for three years?	X	Yes		No		NA
	Does the following information appear on the manifests?	X	Yes		No		NA
(CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) (4053)							
FOR ACCEPTED LOADS:							
	Name and address of the transporter, or processor/re-refiner who provided used oil						
	Name and address of generator or processor/re-refiner from whom used oil was sent						
	EPA Id number of the transporter who delivered the used oil						
	The EPA identification number of the generator or processor/re-refiner who sent oil						
	Quantity of used oil accepted						
	The date of acceptance						
	Dated signature of facility providing the load						
FOR DELIVERED LOADS:							
	Name and address of transporter who delivers the used oil to receiving facility						
	Name and address of transporter who delivers the used oil to receiving facility						
	EPA Id number for transporter who delivers the used oil						
	EPA Id number of the burner, processor/re-refiner, or disposal facility						
	Quantity of oil delivered						
	Date of delivery						
	Dated signature showing receipt of the used oil						
7.	Are residues generated from the storage or transportation process? (4057)		Yes	X	No		NA
	Are these residues managed as required by LAC 33:V.4003.E?		Yes		No	X	NA
8.	Does the owner or operator keep a written operating record that contains:(4055.A)	X	Yes		No		NA
	Records and results of used oil analysis		Yes		No	X	NA
	Reports of incidents which cause the contingency plan to be implemented		Yes		No	X	NA
9.	Does the owner or operator submit a biennial report? (4055.B)		Yes		No	X	NA
10.	Has used oil been shown not to exceed any specifications listed in Table 1 LAC 33:V.4005?	X	Yes		No		NA
IF NO: (CHECK THOSE THAT HAVE NOT BEEN DETERMINED)							
	Arsenic less than 5 ppm						
	Cadmium less than 2 ppm						
	Chromium less than 10 ppm						
	Lead less than 100 ppm						
	Flash point 100°F minimum						
	Total halogens less than 1,000 ppm maximum						
	or if the rebuttable presumption can be applied						
	by the generator (LAC 4003.B.1)						
	Total halogens less than 4,000 ppm maximum						
IF YES: THE FACILITY IS A USED OIL FUEL MARKETER							

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

COMPLETE PART VII ON-SPECIFICATION USED OIL FUEL

**Part V
STANDARDS FOR USED OIL FUEL MARKETERS**

Any person who directs shipment of off-specification used oil from their facility to a used oil burner or first claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications set forth in LAC 33:V.4005 is a marketer.

****IF ALL OIL IS ON-SPECIFICATION, SKIP TO PART VII ON-SPECIFICATION USED OIL FUEL****

1.	Has the facility notified as a used oil marketer?	X	Yes		No		NA
2.	Has used oil been shown not to exceed any specifications listed in Table I?	X	Yes		No		NA

IF NO: (CHECK THOSE THAT HAVE NOT BEEN DETERMINED)

	Arsenic less than 5 ppm						
	Cadmium less than 2 ppm						
	Chromium less than 10 ppm						
	Lead less than 100 ppm						
	Flash point 100°F minimum						
	Total halogens less than 1,000 ppm maximum						
	or if the rebuttable presumption can be applied						
	by the generator (4003.B.1)						
	Total halogens less than 4,000 ppm maximum						

IF YES: COMPLETE ON-SPECIFICATION USED OIL FUEL

3.	Does the marketer make this determination based on analysis or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications? (4081)?	X	Yes		No		NA
4.	Are records of the analyses maintained for three years?	X	Yes		No		NA
5.	Does the marketer initiate a shipment of off-specification used oil to:	X	Yes		No		NA
A	Burners that have an EPA Id Number and	X	Yes		No		NA
B	Burn in an industrial furnace or boiler identified in LAC 33:V.4063.A	X	Yes		No		NA
6.	Are all shipments of used oil accompanied by a manifest? (4085)	X	Yes		No		NA
	How many manifests were inspected? Ten						
	Are manifests retained for three years?	X	Yes		No		NA

**DOES THE FOLLOWING INFORMATION APPEAR ON THE MANIFESTS
(CHECK ANY NOT APPEARING ON THE MANIFEST) (4085)**

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

FOR OFF-SPECIFICATION USED OIL:

	Name and address of the transporter who delivers used oil to burner
	Name and address of burner who receives used oil
	EPA Id number of the transporter who delivered the used oil
	The EPA identification number of the burner
	Quantity of used oil shipped
	The date of shipment
	Dated signature of facility representatives

FOR ON-SPECIFICATION USED OIL:

	Name and address of facility receiving the shipment									
	Quantity of used oil fuel delivered									
	Date of shipment or delivery; and									
	A cross-reference to the record of used oil analysis or other information used to make the determination									
7.	Are copies of the manifests retained for three years?				X	Yes		No		NA
8.	Certification:									

Before used oil is directed to an off-specification used oil burner for the first time, a one-time notice must be obtained written and signed by the burner certifying that: Off specification used oil goes to the facility's Florida Refinery only.

A	The burner has notified the administrative authority stating the location and general description of his used oil activities; and	X	Yes		No		NA
B	The burner will burn the off-specification used oil only in an industrial furnace or boiler identified in LAC 33:V.4063.A.	X	Yes		No		NA
	Does the marketer retain copies of these one-time notices for all facilities to which he directs off-specification used oil?	X	Yes		No		NA

Part VI

USED OIL BURNERS BURNING OFF-SPECIFICATION USED OIL FOR ENERGY RECOVERY

1.	Is the oil burned in one of the following devices? (4063)						
A	Industrial furnace identified in LAC 33:V.4003		Yes		No	X	NA
B	Boiler as defined by LAC 33:V.4003 and identified as		Yes		No	X	NA
B1	Industrial boiler located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes;		Yes		No	X	NA
B2	Utility boilers used to produce electric power, steam, heated or cooled air, or other gases or fluids for sale; or		Yes		No	X	NA
B3	Used oil-fired space heaters provided that the burner meets the provisions of LAC 33:V.4015; or		Yes		No	X	NA
C	Hazardous waste incinerators subject to regulation under LAC 33:V.Chapter 31 or LAC 33:V.Chapter 43.Subchapter N.		Yes		No	X	NA

RCRA Compliance Inspection Report "Used Oil Checklist"

2.	Has the facility notified as an off-specification used oil burner?		Yes		No	X	NA
<u>REBUTTABLE PRESUMPTION FOR USED OIL:</u>							
<p>To ensure that used oil managed at a used oil burner facility is not hazardous waste under the rebuttable presumption of LAC 33:V.4003.B.1.b, a used oil burner must determine whether the total halogen content of used oil managed at the facility is above or below 1,000 ppm.</p>							
1.	Does the used oil burner make this determination?		Yes		No	X	NA
2.	Does the used oil burner make this determination based on testing;		Yes		No	X	NA
	or by applying knowledge of the halogen content of the used oil in light of the materials or processes used; or		Yes		No		NA
3.	Does the used oil burner make this determination using the information provided by the processor/re-refiner subject to regulation under Chapter 40?		Yes		No	X	NA
4.	Are records of analysis maintained for three years?		Yes		No	X	NA
Used Oil Storage:							
1.	Does the facility's management procedures address the SPCC requirements listed in 40 CFR part 112		Yes		No	X	NA
2.	Are containers or above ground tanks used to store used oil in good condition? (no severe rusting, apparent structural defects or deterioration) (4069.B)		Yes		No	X	NA
	Leaking?		Yes		No	X	NA
3.	Are containers or above ground tanks		Yes		No	X	NA
A	Equipped with a secondary containment system? (4069.C,D, & E)		Yes		No	X	NA
	Is the containment system :						
	Diked, bermed, or have retaining walls?					X	
	Does it have a floor (except where existing tanks touch the ground)		Yes		No	X	NA
	Is it impervious to prevent release of used oil to the soil, groundwater, or surface water?		Yes		No	X	NA
	Is there an equivalent system for the above ground tanks?		Yes		No	X	NA
B	Clearly labeled "used oil"? (4069.F)		Yes		No	X	NA
	Are fill pipes used to transfer used oil into under-ground storage tanks clearly marked "Used Oil"?		Yes		No	X	NA
4.	Is there any evidence of a release of used oil to the environment? (4069.G)		Yes		No		NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

5.	Are all shipments of used oil accompanied by a manifest? (4071)		Yes		No	X	NA
How many manifests were inspected?							
	Are manifests retained for three years?		Yes		No	X	NA
<p align="center">DOES THE FOLLOWING INFORMATION APPEAR ON THE MANIFESTS? (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) (4071)</p>							
	Name and address of the transporter who delivered the used oil						
	Name and address of generator or processor/re-refiner from whom used oil was sent						
	EPA Id number of the transporter who delivered the used oil						
	The EPA identification number (if applicable) of the generator or processor/re-refiner who sent oil						
	Quantity of used oil accepted						
	The date of acceptance						
	Dated signature of facility providing the load						
6.	Are residues generated from the storage or transportation process? (4057)		Yes		No	X	NA
	Are these residues managed as required by LAC 33:V.4003.E?		Yes		No	X	NA
7.	Does the owner or operator keep a written operating record? (4055.A)		Yes		No	X	NA
<p align="center">PART VII ON-SPECIFICATION USED OIL FUEL</p>							
<p>A generator, transporter, processor/re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of LAC 33:V.4005 by performing analyses or obtaining copies of analyses documenting that the used oil fuel meets the specifications.</p>							
1.	Are copies of analyses of the used oil maintained on-site? LAC 33:V.4081.B	X	Yes		No		NA
2.	Are they retained for a period of three years? LAC 33:V.4081.B	X	Yes		No		NA
3.	Has the facility notified as a used oil fuel marketer? LAC 33:V.4083	X	Yes		No		NA
4.	Does the facility keep a record of each shipment of used oil to an on-specification used oil burner?	X	Yes		No		NA
<p align="center">DOES THE FOLLOWING APPEAR ON THE MANIFEST? (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) LAC 33:V.4085.B</p>							
	The name and address of the receiving facility						
	The quantity of used oil fuel delivered						
	The date of shipment or delivery						
	Cross-reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under LAC 33:V.4081.A.						
<p align="center">DOES THE FOLLOWING APPEAR ON THE MANIFEST? (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) LAC 33:V.4085.B</p>							
5.	Are all shipments of used oil accompanied by a manifest? LAC 33:V.4053	X	Yes		No		NA

RCRA COMPLIANCE INSPECTION REPORT "USED OIL CHECKLIST"

	How many manifests were inspected? Ten
<p align="center">DOES THE FOLLOWING INFORMATION APPEAR ON THE MANIFESTS? (CHECK ANY <u>NOT</u> APPEARING ON THE MANIFEST) LAC 33:V.4053.B</p>	
	Name and address of the generator, transporter, or processor/re-refiner who provided used oil
	Name and address of the burner, processor/re-refiner, or disposal facility who received the used oil
	The EPA Id number of the transporter who delivers the used oil to the burner, processor/re-refiner, or disposal facility.
	The EPA Id number of the burner, processor/re-refiner, or disposal facility who will receive the used oil
	The quantity of used oil shipped
	Date of shipment

Report By:	<i>Robert G. Braud</i>	5/14/2008
	Robert G, Braud, Environmental Scientist 3	(Date)
Reviewed By:	<i>Pat Breau</i>	6-16-08
	Pat Breau, Environmental Scientist Supervisor	(Date)